

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re	:	Chapter 9
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CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
	:	
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**CITY’S STATEMENT REGARDING DOCUMENT PRODUCTION**

The City of Detroit, Michigan (the “City”) files this Statement Regarding Document Production in accordance with the Court’s direction at the Wednesday, May 28, 2014, status conference.

1. As the City explained during the status conference, the City is completing its production of all documents responsive to the objectors’ formal and informal requests that were made to the City prior to May 28, 2014.

2. At the May 28 status conference, counsel to Syncora Capital Assurance, Inc. and Syncora Guarantee, Inc. (together, “Syncora”) requested that the Court order the City to produce additional documents in two categories:

(1) electronic data from a number of new custodians identified by Syncora; and

(2) electronic data from all custodians, including the new custodians, through April 16, 2014, adding several weeks of electronically stored information (“ESI”) to the

City's original review. The Court granted that request and ordered the City to meet and confer with Syncora regarding its requests.

3. On Thursday, May 29, 2014, that meet and confer occurred. Counsel for the City and Syncora discussed the scope of the City's document collection, review and production (collectively, the "Document Production"), and the City agreed to do the following:

A. Collect data from January 1, 2013 through April 16, 2014 and run its ESI searches on the following additional custodians:

- a. David Bing, former Detroit Mayor
- b. Robert Cline, Director, State-Local Tax Policy  
Economics, Ernst & Young
- c. Caroline Sallee, Manager at Quantitative Economics &  
Statistics, Ernst & Young
- d. James Craig, Detroit Chief of Police
- e. Edsel Jenkins, Detroit Executive Fire Commissioner
- f. Beth Niblock, Detroit Chief Information Officer
- g. Brenda Jones, Detroit City Council President

B. Update its ESI production for all custodians whose electronic files were previously searched and run its ESI searches through April 16, 2014.

4. The City is in the process of collecting data associated with the Document Production, which it expects will be voluminous. The City assumes it will receive full cooperation of third parties such as the City's advisors and vendors. Accordingly and based on the best information available, the City believes that it will complete the Document Production on or before Friday, June 20, 2014 (the "Completion Date").

5. The City recognizes that objectors may have supplemental or informal information and document requests after the Completion Date. As it has done thus far, the City will work cooperatively with any objector to provide additional information and documents in response to such requests.

Dated: May 30, 2014

Respectfully submitted,

/s/ Bruce Bennett

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ATTORNEYS FOR THE CITY OF DETROIT

### **CERTIFICATE OF SERVICE**

I, Bruce Bennett, hereby certify that the foregoing City's Statement Regarding Document Production was filed and served via the Court's electronic case filing and noticing system on this 30th day of May, 2014.

/s/ Bruce Bennett